

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

V.

Case No. 4:12CR252  
(Judge Crone)

JULIO CESAR MALDONADO,

DEFENDANT

**DEFENDANT JULIO CESAR MALDONADO'S  
RESPONSE TO GOVERNMENTS' MOTION IN LIMINE**

TO THE HONORABLE MARCIA CRONE:

The Defendant in the above styled and numbered cause, Responds as follows to the Governments' Motion in Limine.

First, Defendant does not have any opposition to paragraphs numbers 3, 4, 5, and 6 of the motion in limine filed.

Counsel for Defendant does object to paragraph number one in that Counsel for Defendant believes that that limine hinders his representation and ability to argue and defend the Defendant and anticipates an argument such as "I believe the evidence does not rise to the level of Beyond a reasonable doubt" in closing argument as an example. Disallowing counsel for defendant to argue in such a manner would not allow counsel to provide effective representation.

Counsel for Defendant does object to paragraph number two in that through cross examination of cooperating codefendants and other cooperating individuals, it is likely that any charges and or punishment and the range agreed to in said plea would be inquired about to explore and show bias to testify.

Therefore Counsel for defendant, Julio Cesar Maldonado-Gonzalez objects to paragraphs numbers 1 and 2.

Respectfully Submitted,

/s/ Keith Willeford

Keith Willeford

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Attorney for the Defendant,

JULIO CESAR MALDONADO

**CERTIFICATE OF SERVICE**

I certify that a true and exact copy of the Defendant JULIO CESAR MALDONADO Response to Governments' Motion in Limine was filed on the Pacer to Glenn Roque Jackson, Assistant United States Attorney on the 7th day of August, 2014.

/s/ Keith Willeford

Keith Willeford